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June 14, 2013

Via Facsimile: 612-664-5097

The Honorable Ann D. Montgomery
United States District Court
13W U.S. Courthouse
330 South Fourth Street
Minneapolis, MN 55415

Re: *Stichting Pensioenfonds ABP v. Ally Financial Inc., et al.*,
Case No. 12-cv-01381-ADM-TNL (the “ABP matter”)

John Hancock Life Insurance Company, et al., v. Ally Financial, Inc., et al.
Case No. 12-cv-01841-ADM-TNL (the “Hancock matter”)

Dear Judge Montgomery:

As Your Honor instructed, we write to request that due to certain approaching deadlines and currently unfolding events in the Residential Capital, LLC (“ResCap”) bankruptcy proceedings, the Court adjourn the oral argument currently scheduled to take place on June 18, 2013, on the motions to dismiss in both the ABP and Hancock matters. We have conferred with all Defendants in both cases on this issue and they agree with this request.

As your honor is aware, on May 14, 2012, ResCap and numerous affiliated entities (collectively, “Debtors”) filed a voluntary petition in the United States Bankruptcy Court for the Southern District of New York for relief under title 11 of the United States Code. On May 23, 2013, ResCap filed a motion for entry of an order approving Debtors’ entry into and performance under a plan support agreement (the “PSA”).

If approved, the PSA would resolve all of Plaintiffs’ claims in the ABP and Hancock matters against the Debtors’ indirect parent Ally Financial Inc. (“AFI”), the AFI’s non-debtor affiliates, and the individual named defendants. Objections to the PSA must be filed with the bankruptcy court on June 19, 2013 and a hearing on approval of the PSA is currently scheduled for June 26, 2013. A bankruptcy plan, including a proposed trust agreement relating to claims such as those asserted in these lawsuits, with a comprehensive stay, is expected to be filed in

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the next few weeks and the proceedings related to the confirmation of that plan could take several months.

Given that the PSA would resolve the majority of claims asserted in the ABP and Hancock matters, all parties are in agreement that the June 18, 2013 oral argument should be postponed until such time as the impact of proceedings in the bankruptcy on these cases is clear. While some of the pending claims against entities (underwriters) that are not affiliated with Ally will not be released as part of the PSA, Plaintiffs will use the time afforded by the adjournment to ascertain whether those claims can be resolved and, at a minimum, will likely be able to go forward at a future date with a more streamlined set of arguments for the Court to consider.

We therefore request that Your Honor adjourn the hearing presently scheduled for June 18, 2013, for a minimum of 120 days, to permit matters in the ResCap bankruptcy court to proceed and their impact on the ABP and Hancock matters to be evaluated. We would further propose that a status conference take place in September 2013, so that your Honor can be updated on the status of the proceedings.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "G. Jarvis", with a stylized flourish at the end.

Geoffrey C. Jarvis

cc: All counsel of record